

Supporting Document 12

From: DIANA CONKLE
To: Sue Pease
Date: 12/23/02 4:06PM
Subject: Proposed Excavation at Budget Trade & Gas

Sue,

I received a cost pre-approval request from Chuck Houser of SCS&T for the proposed excavation work at Budget Trade & Gas. Bob Trommer and I have reviewed the proposal and relevant technical reports and have discussed the case with Allan Patton. The Fund has the following concerns regarding the proposed excavation.

- The cost of the proposed soil excavation/ ORC application is estimated to be \$412,000. Based on recent soil data, there appears to be limited soil contamination on-site. The highest reported petroleum hydrocarbon concentrations in soil samples collected from borings drilled in 2001 and 2002 were 690 mg/kg for TPH-g, 1,800 mg/kg for TPH-d, 0.69 mg/kg for benzene, and 0.16 mg/kg for MTBE. The Fund does not believe that the current soil data warrants a \$412,000 excavation.
- The groundwater plume has already migrated off-site. Will the proposed soil excavation achieve groundwater cleanup objectives? The Fund will only reimburse the most cost effective remedial alternative. Other (more cost effective) remedial alternatives should be evaluated. Possible alternatives include conducting mobile dual-phase events, installing an interceptor trench, ORC injection, or limited soil excavation with ORC application.
- There is no approved soil cleanup level. According to Chuck Houser, he plans to excavate to 100 ppm. What direction does he have from the Regional Board? Have you approved a cleanup level for soil? A mobile lab should be used to direct the excavation, rather than a PID.
- Both the MTBE and benzene plumes are centered off-site on the adjacent motorcycle repair facility. Could the motorcycle repair facility be a possible source of MTBE and benzene in the groundwater? Is there a drain or sump located inside the repair facility?

Thanks for your time and consideration. Please contact Allan Patton or myself to discuss the proposed excavation.

Happy Holidays,
Diana

CC: Allan Patton; Bob Trommer; Julie Chan

① Called Diana + left message 12/26/02
② talk to Diana on 12/30/02 -

Will excavate to 12' - not mentioned in RTR we get

Bob back on Mon or Tues - need to schedule conference call.